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BEFORE THE
FEDERAL COMMUNICATIONS COMMISSION
WASHINGTON, D.C. 20554

Federal Communications Commission
Office of the Secretary

ORIGINAL

FILE

In the Matter of

The Telephone Consumer Protection
Act of 1991

CC Docket No. 92-90

TO: The Commission

REPLY COMMENTS OF SOUTHWESTERN BELL TELEPHONE COMPANY

Southwestern Bell Telephone Company (SWBT), by its attorneys, and pursuant to Commission Rules 1.415 and 1.419,¹ hereby files its Reply to the Comments of Independent Telecommunications Network, Inc. (ITN) filed in the above-captioned matter.

ITN suggests that "the existing SS7 [Signaling System 7] Network and LIDB [Line Information Database] infrastructure is ideally suited for use as a means for blocking unwanted commercial telephone solicitations."² SWBT agrees that, if the Commission finds that regulation of live solicitation calls is necessary, then use of the LIDB system could possibly prove to be a useful tool in that regard.

However, ITN asserts incorrectly that modifying this infrastructure to allow pre-screening of solicitations could be accomplished easily and with minimal impact upon LIDB operators and upon the telemarketers which would pay for such modifications. Modifications to the existing LIDB and SS7 network infrastructure

¹ 47 C.F.R. §§ 1.415, 1.419.

² ITN, p. 9.

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would be necessary to support pre-screening of telemarketing calls, the costs of which are not known. The full extent of these modifications and costs, in addition to other costs that would be absorbed by telemarketers, would be much greater than those envisioned by ITN and would outweigh any benefits that might be conferred on telephone subscribers. Accordingly, the Commission should not accept ITN's proposal at this time.

I. MODIFICATIONS OF THE LIDB DATABASE AND THE SS7 NETWORK NECESSARY TO SUPPORT ITN'S PROPOSAL WOULD BE SIGNIFICANT AND COSTLY.

ITN states that the necessary infrastructure to provide pre-screening of commercial solicitations is already deployed,³ and that including data on customer acceptance or rejection of commercial solicitations in the LIDB system "would require additional data entry by the LIDB operators, but little, if any, changes in standard LIDB provisioning and maintenance procedures."⁴ To the contrary, the LIDB system and the SS7 network currently are neither designed nor engineered to provide the services which would be necessary should every telemarketer in the country be required to pre-screen solicitations using Local Exchange Carrier (LEC) LIDB systems. Several modifications to these and other systems would be required.

First, the LIDB system contains no fields related to customer preference concerning commercial solicitation. To create such a field, the LIDB database record pertaining to each customer

³ Id., p. 5.

⁴ Id., p. 3.

would have to be expanded. Each customer's preference, once conveyed to SWBT,⁵ would require a service order to be issued and then incorporated into the service order system which supports the LIDB system. SWBT does not know how much time would be required to provision the LIDB system with the requisite fields, nor the costs of preparing the service orders and expanded database records needed to reflect information related to the customer preferences.

Second, an additional billing system or systems would be required to ensure that each telemarketer drawing from the LIDB system would be billed for its usage. Today, SWBT's LIDB usage is billed through systems designed for LECs and interexchange carriers, the only entities that now utilize SWBT's LIDB system. SWBT does not know what reconfiguration would be required to support such a billing system for telemarketers nor what the costs would be.

Third, major alteration of existing LIDB system software would be required to support the new required form of database interrogation, or "query," for the service advanced by ITN. Specifically, new LIDB system indicators and SS7 messages would need to be defined for the service. Furthermore, both generic LIDB system requirements and development work by Bellcore would be

⁵ SWBT does not support ITN's view that SWBT and other local exchange carriers should "periodically mail a request form to each of their telephone customers asking whether the telephone customer wishes to block commercial telephone solicitations." ITN Comments, p. 7. The Telephone Consumer Protection Act does not require this procedure; the Act also prohibits imposing any costs associated with the regulation of live solicitations upon telephone subscribers. 47 U.S.C. § 227(c)(2).

required to incorporate this new service into the LIDB system. The costs associated with these modifications likewise are not known.

Fourth, the introduction of new indicators and SS7 messages would impact many of SWBT's switches which may require development of additional call traffic control methods to maintain reliability of the SS7 network architecture. The required introduction of new indicators and SS7 messages cannot be allowed to threaten network reliability.

These considerations are particularly significant given the added demands which would be placed upon LIDB systems by telemarketers' commercial solicitation queries. As the Commission has observed, more than 19 million solicitation calls are made each day,⁶ and under ITN's proposal, no telemarketer could make a call until verifying the subscriber's preference through contact with a LIDB system. While ITN maintains that this addition of new capacity would be "part of the normal database expansion,"⁷ SWBT's current expansion plans for its SS7 network and LIDB system have not considered the application advanced by ITN. In any event, ITN's proposal cannot be considered "normal" database expansion given the pre-screening required to support the nationwide call volume generated daily by telemarketers.

ITN has not fully considered the adverse impact of its proposal upon LECs' LIDB systems and SS7 networks or the likelihood that its costs would outweigh any benefits to telephone

⁶ Notice of Proposed Rulemaking, p. 11.

⁷ ITN, p. 6.

subscribers. Therefore, ITN's proposal should not be adopted at this time.

II. ADOPTION OF ITN'S PROPOSAL WOULD CAUSE SIGNIFICANT HARDSHIP TO SMALL BUSINESSES.

ITN also understates the financial hardship on small businesses should the Commission adopt ITN's proposal at this time. ITN concedes that telemarketers' "hardware and software may require some modification to implement this pre-screening process."⁸ However, ITN does not identify the source of its projected costs to telemarketers, nor does it detail those costs. This is a significant omission from ITN's proposal.

First, not all telemarketers have the computer capability required by ITN's proposal. Moreover, many telemarketers that do have such computer capacity nevertheless lack the software required to generate queries to LIDB systems in the format envisioned by ITN. ITN does not indicate what these costs would be.

Second, ITN concedes that telemarketers would be required to provide X.25 protocol links to the SS7 service provider (such as ITN), who would then convert X.25 protocol signals to the SS7 protocol.⁹ Such protocol conversion capability would represent even more costs to telemarketers in the form of "conversion and transport charges" by SS7 transport providers (i.e. "hub" providers) such as ITN. ITN does not dispute this fact: "deploying links of this type would probably cost approximately

⁸ Id., p. 5.

⁹ Id., p. 4.

\$10,000 per year for each telemarketer."¹⁰ Additional costs of this magnitude would severely impact small businesses that depend on live telemarketing solicitations.

III. CONCLUSION

Further analysis is required to determine the potential value of ITN's proposal. Current information demonstrates that immediate implementation of the proposal would impose known and unknown costs exceeding any potential benefits. Thus, even if the Commission concludes that regulation of live telemarketing calls is appropriate, it should not adopt ITN's proposal at this time.

Respectfully submitted,

SOUTHWESTERN BELL TELEPHONE COMPANY

By



Durward D. Dupre
Richard C. Hartgrove
Michael J. Zpevak
Robert J. Gryzmala

Attorneys for
Southwestern Bell Telephone Company

1010 Pine Street, Room 2114
St. Louis, Missouri 63101
(314) 235-2507

June 25, 1992

¹⁰ Id., p. 7.

CERTIFICATE OF SERVICE

I, Liz Jensen, hereby certify that the foregoing Reply Comments of Southwestern Bell Telephone Company in Docket 92-90, have been served this 25th day of June, 1992 to the Parties of Record.

Liz Jensen
Liz Jensen

June 25, 1992

Downtown Copy Center
1114 21st Street, N.W.
Washington, D.C. 20036

The Bell Atlantic Telephone
Companies
John M. Goodman
Lawrence W. Katz
1710 H Street, N.W.
Washington, D.C. 20006

BellSouth Corporation
William B. Barfield
A. Kirven Gilbert III
1155 Peachtree Street, N.E.
Suite 1800
Atlanta, Georgia 30367-6000

The Southern New England Telephone
Company
Linda D. Hershman
227 Church Street
New Haven, CT. 06506

Buck County Courier Times
Arthur E. Mayhew
8400 Route 13
Levittown, Pennsylvania 19057

Pacific Bell and Nevada Bell
James P. Tuthill
Nancy C. Woolf
140 New Montgomery St., Room 1523
San Francisco, CA 94105

Pacific Bell and Nevada Bell
James L. Wurtz
1275 Pennsylvania Avenue, N.W.
Washington, D.C. 20004

Teknekron Infoswitch Corporation
Michael J. Tamer, President
4425 Cambridge Road
Ft. Worth, Texas 76155

United States Telephone Association
Martin T. McCue
Linda Kent
900 19th Street, N.W., Suite 800
Washington, D.C. 20006-2105

The Bellingham Herald
J. C. Hickman, Publisher
1155 State Street
P. O. Box 1277
Bellingham, Washington 98227

Consumer Action
Ken McEldowney
Executive Director
116 New Montgomery Street, Suite 233
San Francisco, California 94105

Coalition of Higher Education
Assistance Organizations
Gary Hauser, President
1101 Vermont Avenue, N.W., Suite 400
Washington, D.C. 20005-3521

The Infiniti Group, Inc.
Will McClure
1060A North Market Street
Troy, Ohio 45373

MessagePhone, Inc.
Douglas E. Neel
VP-Regulatory Affairs
5910 N. Central Expressway
Suite 1575
Dallas, Texas 75206

National Association of Water
Companies
James B. Groff, Executive Director
1725 K Street N.W., Suite 1212
Washington, D.C. 20006-1401

The Orlando Sentinel
Paul E. Jones
Sales Development Manager
633 North Orange Avenue
Orlando, Florida 32801

Chico Enterprise-Record
James L. Dimmitt, Publisher
400 East Park Avenue
P. O. Box 9
Chico, California 95927-0009

The Indianapolis Star
Malcolm W. Applegate
307 N. Pennsylvania
Indianapolis, Indiana 46204

The Plain Dealer
Alex Machaskee
President and Publisher
1801 Superior Ave.
Cleveland, Ohio 44114

The Times-Picayune
Ashton Phelps, Jr., Publisher
3800 Howard Avenue
New Orleans, Louisiana 70140-1097

Los Angeles Daily News
Chuck Schussman, Telemarketing
Sales Manager
21221 Oxnard Street
Woodland Hills, CA 91365-4200

Radio Telecom and Technology, Inc.
Louis Martinez, President
17511 Santa Rosa Road
Perris, CA 92570

Arent Fox Kintner Plotkin & Kahn
Peter Tannenwald
1050 Connecticut Ave., N.W.
Washington, D.C. 20036-5339

Nancy Barthelmess
10290 Vicksburg Drive
Cupertino, CA 95014

Kyle Fuller
347 Richards Road
Columbus, Ohio 43214

Lansing State Journal
Richard J. Ferris,
Circulation Director
120 E. Lenawee St.,
Lansing, Michigan 48919

The Stockton Record
Orage Quarles III,
President and Publisher
530 E. Market Street
Stockton, CA 95202

San Francisco Newspaper Agency
John B. Raytis,
Vice President/Circulation
925 Mission Street
San Francisco, CA 94103

Centre Daily Times
Cheryl Issod
Sales Manager
P. O. Box 89
State College, PA 16804

CUNA Mutual Insurance Group
Don D. Davidson
AVP-Call Marketing Center
5910 Mineral Point Road
Madison, Wisconsin 53701-0391

Kentucky Educational
Television, Inc.
John F. Gorman
Director of Interactive Learning
600 Cooper Drive
Lexington, KY 40502

The Review
Debbie Fero
Circulation Director
116 Main Street
P. O. Box 503
Towanda, PA 18848

The Sentinel-Record, Inc.
Wallace Ballentine
General Manager
P. O. Box 580
Hot Springs National Park,
Arkansas 71902

Thomasville Times-Enterprise
Den Dickerson
106 South Street
Thomasville, Georgia 31799

Milne, Rizk, Myers, Boney
& Buckingham P.A.
Attorneys at Law
4595 Lexington Avenue, Suite 100
Jacksonville, Florida 32210-2058

Santa Barbara News-Press
Joe Tarrer, Publisher
De La Guerra Plaza
P.O. Box 1359
Santa Barbara, CA 93102

Texarkana Gazette
Buddy King
General Manager
315 Pine Street
Texarkana, Texas 75504

The Victoria Advocate
John M. Roberts
P. O. Box 1518
Victoria, Texas 77902

Electronic Information Systems, Inc.,
Jodi Meryl Wallace
Executive Director, Corporate Affairs
1351 Washington Boulevard
Stamford, CT 06902

Direct Marketing Association
Ian D. Volner, Esq.
Allan R. Adler, Esq.
Michelle M. Shanahan, Esq.
Cohn and Marks, Suite 600
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Banc One Corporation
Debra L. Lagapa
Robert G. Ballen
Mary K. O'Connell
MORRISON & FOERSTER
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006

Centel Corporation
Charles F. Wright
VP-Corporate Development
8725 Higgins Road
Chicago, Illinois 60631

Centel Corporation
Theodore D. Frank
Vonya B. McCann
Arent Fox Kintner Plotkin & Kahn
1050 Connecticut Avenue, N.W.
Washington, D.C. 20036-5339

Cellular Telecommunications Industry
Association
Michael Altschul
Jack W. Whitley
1133 21st Street, N.W.
Suite 300
Washington, D.C. 20036

GTE Service Corporation
Daniel L. Bart
1850 M. Street, N.W.
Suite 1200
Washington, D.C. 20036

MCI Telecommunications Corporation
James R. Cooke
Harris, Beach & Wilcox
1611 North Kent Street, Suite 1000
Arlington, Virginia 22209

North American Telecommunications
Association
Albert H. Kramer
Robert F. Aldrich
KECK, MAHIN & CATE
1201 New York Avenue, N.W.
Penthouse Suite
Washington, D.C. 20005

NYNEX Telephone Companies
Mary McDermott
Carlos J. Sandoval
120 Bloomingdale Road
White Plains, NY 10605

Olan Mills, Inc.
Thomas W. Kirby
James T. Bruce, III
Paul C. Smith
Rachel J. Rothstein
of
WILEY, REIN & FIELDING
1776 K Street, N.W.
Washington, D.C. 20006

Sprint Corporation
Jay C. Keithley
Leon Kestenbaum
Phyllis Whitten
1850 M Street N.W.
Suite 1100
Washington, D.C. 20036

Sprint Corporation
W. Richard Morris
P. O. Box 11315
Kansas City, MO. 64112

U S West Communications, Inc.
Lawrence E. Sarjeant
Kathryn Marie Krause
1020 19th Street, N.W., Suite 700
Washington, D.C. 20036

Time Warner, Inc.
Aaron I. Fleischman
Charles S. Walsh
Matthew D. Emmer
Fleischman and Walsh
1400 16th Street, N.W.
Washington, D.C. 20036

Ameritech Operating Companies
Floyd S. Keene
Pamela J. Andrews
Its Attorneys
2000 West Ameritech Center Drive
Room 4H94
Hoffman Estates, Illinois 60196-1025

American Telephone & Telegraph
Francine J. Berry
David P. Condit
Sandra Williams Smith
Its Attorneys
295 North Maple Avenue
Room 3244J1
Basking Ridge, New Jersey 07920

American Express Company
James S. Blaszak
Kevin S. DiLallo
GARDNER, CARTON & DOUGLAS
1301 K Street, N.W.
Suite 900
Washington, D.C. 20005

Richard E. Wiley
Michael Yourshaw
Wiley, Rein & Fielding
Attorneys for
American Newspaper Publishers
Association
1776 K Street, N.W.
Washington, D.C. 20006

Ann E. Henkener
Public Utilities Commission of
Ohio
180 E. Broad Street
Columbus, Ohio 43266-0573

Dwaine L. Canova
Zacson Corporation
3825 Hopyard Road
Suite 220
Pleasanton, CA 94588

Daniel L. Jaffe
Association of National
Advertisers, Inc.
1725 K Street, N.W.
Suite 601
Washington, D.C. 20006

Thomas A. Stroup
Telocator
1019 19th Street, N.W.
Suite 1100
Washington, D.C. 20036

William C. Marcil
The Forum Publishing Co.
Box 2020
Fargo, North Dakota 58107

Frank E. Deaner
The Ohio Newspaper Association
1225 Dublin Road
Columbus, Ohio 43215

Gary W. Ostrom
The Muskegon Chronicle
981 Third Street
Muskegon, MI 49443

Joseph Marrone
New Haven Register
40 Sargent Drive
New Haven, CT 06511-5918

Fred Stickel
Oregonian Publishing
Portland, Oregon 97201

Stephen A. Rogers
The Syracuse Newspapers
Clinton Square
P.O. Box 4915
Syracuse, New York 13221-4915

Carole L. Heywood
Worcester Telegram & Gazette
20 Franklin Street
Worcester, Massachusetts 01615-0012

William J. Cowan
State of New York Department of
Public Service
Three Empire State Plaza
Albany, NY 12223

Rex D. Ledo
The Tampa Tribune
P. O. Box 191
Tampa, Florida 33601

Brian R. Moir
Fisher, Wayland, Cooper & Leader
Attorneys for ICA
1255 23rd Street, N.W.
Suite 800
Washington, D.C. 20037-1170

Jerry H. Wagner
Rocky Mountain BankCard System
P.O. Box 5952
Denver, Colorado 80217

Richard L. Holtz
Journal and Courier
217 N. Sixth Street
Lafayette, IN 47901

George Arwady
Kalamazzo Gazette
401 South Burdick Street
Kalamazoo, Michigan 49003

Stephania Grubert
Pennsylvania Newspaper
Publisher's Association
2717 North Front Street
Harrisburg, PA 17110

Richard J. McClennen
Detroit Newspaper Agency
5 w. Lafayette Blvd.
Detroit, MI 48226

David A. Brune
Baltimore Gas and Electric
Charles Center
P.O. Box 1475
Baltimore, Maryland 21203

W. Stacey Cowles
Review Tower
West 999 Riverside Ave.
Spokane, WA 99201

Pipes Gaines
Daily News
P.O. Box 90012
Bowling Green, Kentucky 42102-9012

David Starr
1860 Main Street
Springfield, MA 01101

James B. Miller
The Pacesetter Corporation
4343 South 96th Street
Omaha, Nebraska 68127

John W. Tadlock
Alpha Information Services
1720 E. University Avenue
Oxford, MS 38655

Richard A. Morton
The Grand Rapids Press
155 Michigan NW
Grand Rapids, Michigan 49503

Thomas C. Franks
American Resort Development
Association
1220 L Street, N.W, Suite 510
Washington, D.C. 20005

Eliot C. White
The Record-Journal Publishing
Company
11 Crown Street
Meriden, CT 06450

Geoffrey B. West
President
West Marketing Services, Inc.
P.O. Box 181
Summerland Key, Florida 33042

John W. Gemmer
The Goshen News
114 South Main Street
Goshen, Indiana 46526-0569

David Dickson
501 North Calvert Street
Baltimore, Maryland 21278-0001

Jeffrey D. Goltz
Attorney General's Office
1300 Dexter Horton Building
Seattle, Washington 98104

Janet H. and Robert R. C.
Buchan MD
404 South Plum Street
Troy, Ohio 45373

Stephen M. Nelson
Community Benefits Corporation
1109 N. Thompson Street
Richmond, Virginia 23230

Harlan B. Ratzky
1941 Armacost Avenue
Los Angeles, CA 90025

Donald A. Widder
United Electronic Cooperative,
Inc.
P.O. Box 688
DuBois, Pennsylvania 15801

American Collectors Association
Basil J. Mezines, General Counsel
Stein, Mitchell, & Mezines
1100 Connecticut Avenue, N.W.
Suite 1100
Washington, D.C. 20036

Independent Telecommunications Network,
Inc.
John F. Dodd
Brad I. Pearson
Smith, Gill, Fisher & Butts,
One Kansas City Place
1200 Main Street, 35th Floor
Kansas City, MO. 64105-2152

Student Loan Marketing Association
Peter A. Rohrback
Its Attorney
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004

Utilities Telecommunications Council
Jeffrey L. Sheldon
Mara J. Primosch
1140 Connecticut Avenue, N.W.
Suite 1140
Washington, D.C. 20036

Private Citizen, Inc.
Robert S. Bulmash
President
P.O. Box 233
Naperville, IL 60566

Cox Enterprises, Inc.
Brenda L. Fox
Peter H. Feinberg
Christine Bumpus
Its Attorneys
Dow, Lohnes & Albertson
1255 Twenty-Third Street, N.W.
Suite 500
Washington, D.C. 20037

Intervoice
Kelly K. Kordzik
Its Attorney
Winstead Sechrest & Minick
5400 Renaissance Tower
1201 Elm Street
Dallas, Texas 75270

ITI Marketing Services, Inc.
Kathryn A. Ekeler, Esq.
8712 W. Dodge Road
Suite 200
Omaha, NE 68114

ITI Marketing Services, Inc.
Ian D. Volner, Esq.
Cohn and Marks
1333 New Hampshire Avenue, N.W.
Washington, D.C. 20036

Privacy Times
Evan Hendricks
Editor/Publisher
P.O. Box 21501
Washington, D.C. 20009

People of the State of California,
and, the Public Utilities Commission of
the State of California
Peter Arth, Jr.
Edward W. O'Neill
Ellen Levine
505 Van Ness Avenue
San Francisco, CA 94102

National FaxList
Donald M. McGrath
President
P.O. Box 9777
Trenton, NJ 08650

National Rural Electric Cooperative
Association
Bob Bergland
Executive Vice President
1800 Massachusetts Avenue, N.W.
Washington, D.C. 20036

Merrill Lynch, Pierce, Fenner & Smith,
Inc.
Bruce E. Thompson, Jr.
Vice President, Director of Government
Relations
Merrill Lynch & Co., Inc.
3000 K Street, N.W., Suite 620
Washington, D.C. 20007

CMS A/R Services
Ronald G. Doster
Director of Client Services
One Jackson Square
P.O. Box 3500
Jackson, Michigan 49204-3500

MBNA America Bank
John R. Cochran
Vice President
400 Christiana Road
Newark, Delaware 19713

The Sun
F. Michael Jelley
Sales & Marketing Manager
399 North D Street
San Bernardino, CA 92401

King TeleServices
John J. Gavin
President
77 Water Street
New York, New York 10005

The Free Press Standard
Maynard A. Buck, Jr.
Publisher
Carrollton Publishing Company
43 East Main Street
P.O. Box 37
Carrollton, Ohio 44615

The Johnstown Tribune Publishing
Company
Christine M. Yakulik
The Tribune Democrat
Johnstown, Pennsylvania 15907

The Ann Arbor News
David D. Wierman
340 E. Huron Street
Ann Arbor, MI 48106-1147

The Star-Ledger
Albert D. Gittrich
Circulation Director
Star-Ledger Plaza
Newark, New Jersey 07101

American Bankers Association
Philip S. Corwin
Director and Counsel
Operations and Retail Banking
1120 Connecticut Avenue, N.W.
Washington, D.C. 20036

National Telephone Cooperative Assoc.
David Cosson
L. Marie Guillory
Its Attorneys
2626 Pennsylvania Avenue, N.W.
Washington, D.C. 20037

Direct Selling Association
D. Keith Hancock
Manager of Government Relations
1776 K Street, N.W., Suite 600
Washington, D.C. 20006

Amway Corporation
Dirk C. Bloemendaal, Counsel
Corporate Government Affairs
7575 Fulton Street, East
Ada, Michigan 49355-7410

U.S. Intelco Networks, Inc.
Stephen G. Kraskin
Brian D. Robinson
Its Attorneys
Blooston, Mordkofsky, Jackson & Dickens
2120 L Street, N.W.
Washington, D.C. 20037

Investment Company Institute
Frances M. Stadler
Assistant Counsel
1600 M Street, N.W.
Washington, D.C. 20036

The Princeton Packet, Inc.
Edward M. Kelley
Circulation Director
300 Witherspoon Street
Princeton, NJ 08540

Detroit Newspaper Agency
Richard J. McClennen
Senior VP-Marketing
615 W. Lafayette Blvd
Detroit, MI 48226

Pioneer Electric Cooperative
David L. Jesse
General Manager
West Highway 160
Box 368
Ulysses, Kansas 67880

The Morning Call
Richard E. Forgay II
Circulation Marketing Manager
101 North Sixth Street
P.O. Box 1260
Allentown, PA 18105

The Verde Independent
Dick Larson
Publisher
P.O. Box 429
116 South Main Street
Cottonwood, Arizona 86326

Citicorp
P. Michael Nugent
Patrick D. Hadley
425 Park Avenue
2nd Floor/Zone 6
New York, New York 10043

Citicorp
Clinton W. Walker
7720 York Road
Towson, Maryland 21204

Lejeune Associates of Florida
Peter A. Rohrback
Its Attorney
Hogan & Hartson
555 13th Street, N.W.
Washington, D.C. 20004

Household International
A. Thomas Carroccio
Its Attorney
Santarelli, Smith & Carroccio
1155 Connecticut Avenue, N.W.
Washington, D.C. 20036-4306

Mr. Fax
Daniel Brenner
Dean Hansell
Ari Kahan
Its Attorneys
LeBoeuf, Lamb, Lieby & MacRae
725 South Figueroa Street
Suite 3600
Los Angeles, CA. 90017-5436

Gannett Co., Inc.
Peter D. O'Connell
Kathleen A. Kirby
Its Attorneys
Reed Smith Shaw & McClay
1200 18th Street, N.W.
Washington, D.C. 20036

Safecard Services, Inc.
Andrew D. pman
Margaret M. Charles
Swidler & Berlin, Chartered
3000 K Street, N.W.
Suite 300
Washington, D.C. 20007

International Inc.
Diane S. Killory
Its Attorney
Morrison & Foerster
2000 Pennsylvania Avenue, N.W.
Washington, D.C. 20006-1888

Securities Industry Association
William Jordan
Director, State Governmental
Affairs
120 Broadway
New York, NY 10271

Securities Industry Association
Richard E. Wiley
James T. Bruce, III
Rachel J. Rothstein
Its Attorneys, of
Wiley, Rein & Fielding
1776 K Street, N.W.
Washington, D.C. 20006

National Consumers League
John F. Barker
Senior Program Associate
Suite 928 N
815 Fifteenth Street N.W.
Washington, D.C. 20005

National Retail Federation
Michael J. Altier
Vice President, General Counsel
701 Pennsylvania Avenue, N.W.
Suite 710
Washington, D.C. 20004

Reese Brothers, Inc.
James R. Cooke
Its Attorney
Harris, Beach & Wilcox
Suite 1000
1611 North Kent Street
Arlington, Virginia 22209

Center for the Study of Commercialism
Douglas L. Parker, Esq.
Institute for Public Representation
Georgetown University Law Center
600 New Jersey Avenue, N.W. #312
Washington, D.C. 20001

Center for the Study of Commercialism
Of Counsel
Sarah J. Starrett
Graduate Fellow
Georgetown University Law Center
600 New Jersey Avenue, N.W., #312
Washington, D.C. 20001

Belleville News-Democrat
Gary Berkley
President & Publisher
120 South Illinois Street
Belleville, IL. 62220

Argus Leader
Larry Fuller, Publisher
Regional Vice President
200 South Minnesota Avenue
Box 5034
Sioux Falls, South Dakota 57117-5034

National Association of Realtors
Stephen Driesler
Senior Vice President & Chief Lobbyist
Government and Political Relations
777 14th Street N.W.
Washington, D.C. 20005-3271

J. Blenkarn Systems
Mr. Jeff Blenkarn
President
131 Caledonia N.E.
Grand Rapids, Michigan 49505

The Hartford Courant
Raymond A. Jansen
Publisher and Chief Executive Officer
Hartford, Connecticut 06115

Avon
Mary Ann Dirzis
Director, Government Affairs
Nine West 57th Street
New York, New York 10019